

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

IN RE:	)	Chapter 11
	)	
CIRCUIT CITY STORES, INC., <i>et al.</i> ,	)	Case No. 08-35653-KRH
	)	
Debtors.	)	
_____	)	

**VERIFIED STATEMENT OF MULTIPLE CREDITOR REPRESENTATION  
PURSUANT TO BANKRUPTCY RULE 2019**

COMES NOW the law firm Magee, Foster, Goldstein & Sayers, P.C. ("MFGS") as counsel for the creditors listed on Exhibit A, attached hereto and incorporated herein by reference (collectively, the "Creditors"), asserting claims against Circuit City Stores, Inc. and certain of its affiliated debtors (collectively, the "Debtors"), and make the following statements pursuant to Federal Rule of Bankruptcy Procedure 2019(a):

1. The creditors' names and addresses are attached as Exhibit A.
2. The creditors are all governmental divisions located in the state of Texas, and are taxing authorities with outstanding *ad valorem* real and/or business personal property taxes secured by the Debtors' real and/or business personal property. The approximate amount of each creditor's claim is listed on Exhibit A.
3. The facts and circumstances relating to the employment of MFGS are that MFGS serves as local counsel to the Creditors in the Debtors' jointly administered bankruptcy cases. Lead

MAGEE, FOSTER,  
GOLDSTEIN & SAYERS  
A PROFESSIONAL CORPORATION

P.O. Box 404  
Roanoke, Virginia 24003-0404  
(540) 343-9800

ATTORNEYS AND COUNSELORS AT LAW

A. Carter Magee, Jr., Esq. (VSB #20284)  
W. Joel Charboneau, Esq. (VSB #68025)  
Magee, Foster, Goldstein & Sayers, P.C.  
Post Office Box 404  
Roanoke, Virginia 24003-0404  
(540) 343-9800  
(540) 343-9898 FAX  
[cmagee@mfgs.com](mailto:cmagee@mfgs.com)  
[jcharboneau@mfgs.com](mailto:jcharboneau@mfgs.com)

counsel for Lewisville Independent School District is Andrea Sheehan of Law Office of Robert Luna, P.C. Lead counsel for Arlington Independent School District *et al.*<sup>1</sup> is Elizabeth Banda of Perdue, Brandon, Fielder, Collins & Mott, L.L.P.

4. The creditors are billed monthly at MFGS's standard hourly rates for its shareholders, counsel, associates, paralegals, and legal assistants for time spent and for costs incurred in providing legal services, pursuant to MFGS's standard terms of engagement.

5. MFGS does not hold a claim against the Debtors.

Dated: December 17, 2008

Respectfully submitted.

MAGEE, FOSTER,  
GOLDSTEIN & SAYERS, P.C.

/s/ A. Carter Magee, Jr.

A. Carter Magee, Jr., Esq. (VSB #20284)

W. Joel Charboneau (VSB#68025)

Garren R. Laymon (VSB #75112)

Magee, Foster, Goldstein & Sayers, P.C.

Post Office Box 404

Roanoke, Virginia 24003

540-343-9800

540-343-9898 (f)

*Local Counsel for Lewisville ISD and Arlington ISD  
et al.*

MAGEE, FOSTER,  
GOLDSTEIN & SAYERS  
A PROFESSIONAL CORPORATION

P.O. Box 404  
Roanoke, Virginia 24003-0404  
(540) 343-9800

ATTORNEYS AND COUNSELORS AT LAW

---

<sup>1</sup> Consisting of every creditor listed on Exhibit A other than Lewisville Independent School District.

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of December, 2008, the foregoing document was served by first class mail, postage pre-paid, upon the following persons:

Daniel F. Blanks, Esq.  
Douglas M. Foley, Esq.  
McGuireWoods LLP  
9000 World Trade Center  
101 W. Main St.  
Norfolk, VA 23510  
*Counsel for Debtors*

Dion W. Hayes, Esq.  
Joseph S. Sheerin, Esq.  
Sarah Beckett Boehm, Esq.  
McGuireWoods LLP  
One James Center  
901 East Cary St.  
Richmond, VA 23219  
*Counsel for Debtors*

Gregg M. Galardi, Esq.  
Ian S. Fredericks, Esq.  
Skadden Arps Slate Meagher  
& Flom, LLP  
One Rodney Sq.  
PO Box 636  
Wilmington, DE 19899  
*Counsel for Debtors*

Chris Dickerson, Esq.  
Skadden Arps Slate Meagher  
& Flom, LLP  
333 West Wacker Drive  
Chicago, IL 60606  
*Counsel for Debtors*

Lynn L. Tavenner  
Paula S. Beran  
Tavenner & Beran, PLC  
20 North Eighth Street.  
Second Floor  
Richmond, VA 23219  
*Counsel for the Official  
Committee of Unsecured  
Creditors*

Robert J. Feinstein  
Pachulski Stang Ziehl &  
Jones LLP  
780 Third Ave. 36th Floor  
New York, NY 10017  
*Counsel for the Official  
Committee of Unsecured  
Creditors*

John D. Fiero  
Pachulski Stang Ziehl &  
Jones LLP  
150 California Street, 15th  
Floor  
San Francisco, CA 9411-4500  
*Counsel for the Official  
Committee of Unsecured  
Creditors*

Jeffrey N. Pomerantz  
Brad R. Godshall  
Pachulski Stang Ziehl &  
Jones, LLP  
10100 Santa Monica blvd,  
11th Floor  
Los Angeles, CA 90067-4100  
*Counsel for the Official  
Committee of Unsecured  
Creditors*

Robert B. Van Arsdale  
Office of the U. S. Trustee  
701 East Broad Street, Suite  
4304  
Richmond, VA 23219

On this same date, I electronically filed the original with the United States Bankruptcy Court for the Eastern District of Virginia which caused electronic copies to be served on the United States Trustee, the Debtor's counsel, and all other registered users of the ECF system that have filed notices of appearance in this case.

By: /s/ A. Carter Magee, Jr.

MAGEE, FOSTER,  
GOLDSTEIN & SAYERS

A PROFESSIONAL CORPORATION

P.O. Box 404  
Roanoke, Virginia 24003-0404  
(540) 343-9800

ATTORNEYS AND COUNSELORS AT LAW

U:\A CLIENTS\Arlington ISD et al\Statement regarding representation of multiple creditors.doc

## Exhibit A

Creditor	Claim	Creditor	Claim
Alief ISD P.O. Box 368 Alief, TX 77411	\$16,729.00	Humble ISD P.O. Box 4020 Houston, TX 77210	\$16,483.79
Arlington ISD 1203 W. Pioneer Pkwy. Arlington, Tx 76013	\$31,007.93	Hurst, City of 1505 Precinct Line Road Hurst, Texas 76054	\$12,445.88
Baybrook MUD #1 P.O. Box 1368 Friendswood, TX 77549-1368	\$16,937.71	Lubbock Central Appraisal District 1715 26th Street Lubbock, TX 79411	\$40,408.33
Brazoria County 111 East Locust Rm 100-A Angleton, TX 77515	\$42,485.79	Lake Worth, City of 3805 Adam Grubb Lake Worth, Texas 76135	\$6,476.96
Brazoria County MUD #6 P.O. Box 1368 Friendswood, TX 77549-1368	\$12,981.40	Lewisville ISD P.O. Box 217 Lewisville, TX 75067-0217	\$32,090.89
Burleson ISD 1160 SW Wilshire Blvd. Burleson, TX 76028	\$33,953.06	Midland County Tax Office 2110 N. A Street Midland, Texas 79705	\$3,695.85
Carroll ISD Administration Center 3051 Dove Road Grapevine, Texas 76051	\$32,857.80	Potter County Tax Office P.O. Box 2289 Amarillo, Texas 79105	\$43,343.60
Cedar Hill, City of 285 Uptown Blvd. Cedar Hill, TX 75104	\$11,934.85	Tyler ISD, c/o Tab Beall Perdue Brandon Fielder Collins & Mott, LLP PO Box 2007 Tyler, TX 75710-2007	\$17,033.18 <sup>(P)</sup> \$19,817.38 <sup>(R)</sup>
Clear Creek ISD P.O. Box 799 League City, TX 77574	\$34,150.77 <sup>(P)</sup> \$27,093.63 <sup>(R)</sup>	Wichita County 900 7 <sup>th</sup> Street Wichita Falls, TX 76301	\$7,055.12
Fort Bend ISD 500 Liberty Street, Suite 101 Richmond, TX 77469-3500	\$25,140.79	Wichita Falls, City of P. O. Box 1431 1300 7 <sup>th</sup> Street Wichita Falls, TX 76307	\$9,742.68
Fort Bend LID 2 11111 Katy Freeway Suite 725 Houston, TX 77079	\$2,870.41	Wichita Falls ISD 1104 Broad Street Wichita Falls, TX 76301	\$19,624.15
Fort Worth ISD 100 N University Dr. Fort Worth TX 76107	\$21,476.21	Woodlands Metro MUD 2455 Lake Robbins Drive The Woodlands, TX 77380	\$3,528.42 <sup>(P)</sup> \$2,333.14 <sup>(R)</sup>
Galena Park ISD P.O. Box 113 Galena Park, TX 77547	\$27,742.03	Woodlands RUD #1 400 North San Jacinto Conroe, TX 77301	\$8,798.77 <sup>(P)</sup> \$5,818.12 <sup>(R)</sup>
Hidalgo County & Hidalgo County Drainage District #1 c/o Hidalgo County Tax Office P.O. Box 178 Edinburg, TX 78540	\$17,427.73	Total	\$571,394.48

(P) and (R): Creditors with multiple claims have both a real and a personal property tax claim, as designated.